

NE  
FILED

MAR 21 2013

IN THE UNITED STATES COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

GERMAINE J GRANT  
Plaintiff.

Case No. 1:11-CV-5611

Hon. JUDGE John W Darrah

-v-

Reliable Recovery Services INC,

Santander Consumer usa inc

Presentment to motion to file leave motion to dismiss Santander's amended counterclaim  
and grant motion for judgment

Counter Defendant / Plaintiff, Germaine Grant in his own behalf moves this court to request by the plaintiff **Motion to dismiss the complaint** for defendants/ counter plaintiff's, Santander for his failure to abide by discovery process order previously issued by this court.. In support thereof Germaine Grant the live and living states as follows:

1. On april 25 2012 this court order the parties for discovery once discovery is order all parties per federal rules our suppose to release their disclosure within 21 to 30 days so discovery process can go as the court planned.
2. Sometimes around august of 2012 4 months within the discovery stag germaine grant plaintiff finally received the disclosure from Santander but per federal rule the plaintiff was suppose to have this disclosure to the plaintiff in may of 2012
3. In august of 2012 germaine grant file motion to the court to have the defendants to follow court rules and I ask for more time of my discovery which the court during

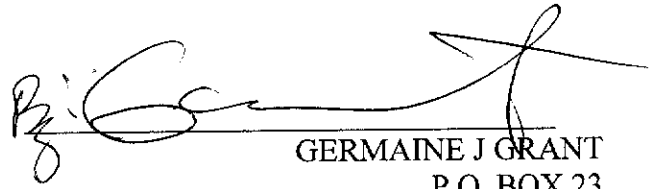
the hearing basically chaste the plaintiff for filling such motion the defendant has been allowed to break all court discovery process rules without issue. This was purposely done by the defendant because the defendant never gave any excuse to why it took them 4 month to get over disclosure to the plaintiff, this has and still has prejudice the plaintiff process during discovery the plaintiff was only left with 2 months of discovery because he didn't have the disclosure from defendant to proceed the plaintiff ask the court for more time which they denied but turned around and gave the defendant reliable 30 more extra days for their discovery which I figured all parties had the same time to continue their discovery I told the courts on record that we still having discovery issue and I still don't have discovery from the plaintiffs which the court ignored again.

4. This isn't the only discovery issue I having with the defendant the defendant has refused to turn over records to me which he stated to me in meeting 37 that he had this document but he needed to redacted the papers and then he'll get them over to me by mail. I still have not received phone records in which I requested, I also request a unbroken chain link assignment from Santander which would have given them some authority to collect a debt from the plaintiff. The defendant answer the question which is on the courts records in which it state under investigation according to discovery this isn't answer, I also ask for a front and back copy of eloan check in which I have not received. (See exhibit 2)
5. The defendant has prejudice and continue to prejudice the case of the plaintiff even after we had a meeting 37 about this issue in which they stated in that meeting I would receive the papers which I did received some papers I needed, which was the accounting of records from Santander on march 5 2013 which the defendant used in the deposition hearing . Now that I have the information that I ask for in the month of September I now have question about this document and additional question in which

I place on hold until I received such documents from the defendant . (see exhibit 1)  
this delay by the defendant has greatly prejudice my case.

6. I have not gotten this chance to ask all my discovery question do the extended delay that the defendant has cause now that I have received partial discovery information in the month before trial I have additional discovery which critical to my case that need to be answered the delays were cause by the defendant without great reason other than to prejudice the plaintiff case.
7. The plaintiff files a motion to compel with the courts and ask for extra discovery time which the courts have denied. The plaintiff has given the defendant his delayed question to answer do to their delay and not following discovery rule this was hauled by a protective order that was granted by the courts. The plaintiff hasn't had the chance that is suppose be allowed by the courts during discovery process and when the plaintiff has brought this issue to the court attention the court has ignored.
8. Santander as purposely prejudice the plaintiff case and is still prejudice his case but not turning over phone records, assignments, front & back copy of eloan check turning over account information from Santander months after the due date in which it was ask for. The defendant purposely kept this discovery information from the defendants so the plaintiff couldn't ask certain question about the documents.

**WHEREFORE**, for the foregoing reasons, Santander respectfully request this Court to dismiss Santander amend counterclaim with prejudice. Enter judgment in favor of Germaine Grant on the amend complaint; and, such other relief as the court may deem proper.

A handwritten signature in black ink, appearing to read 'B. Grant', is written over a horizontal line.

GERMAINE J GRANT

P.O. BOX 23

JOLIET IL 60433

815 582-3518

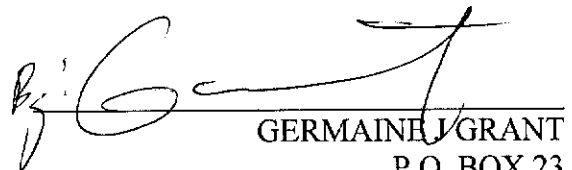
**CERTIFICATE OF SERVICES**

I, GERMAINE J. GRANT, PRO se plaintiff, certify that I shall cause to be served a copy of the notice of motion and motion to Presentment to motion to file leave motion to dismiss

**Santander's amended counterclaim and grant motion for judgment**

is listed individuals by deposit in the u.s mail box 51 clinton Joliet il 60434, postage prepaid, before the hour of 500pm, messenger delivery, federal Express, facsimile transmitted from (815)

582-3518 or electronically via the ecf as indicated, on march 20<sup>th</sup> 2013

  
GERMAINE J GRANT  
P.O. BOX 23  
JOLIET IL 60433

815 582-3518

-----Cm/ecf

~~-----facsimile~~

-----federal Express

----- regular us mail

----- messenger

-----E-Mail

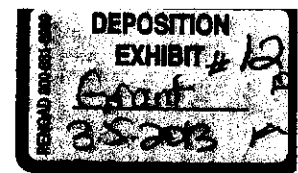
TO: sorman & frankel, ltd  
Richard J Sorman, Esq  
180 north Lasalle street suite 2700  
Chicago il 60601-1081

Ronald W. Payne  
Lewis Brisbois Bisgaard & Smith LLP  
550 West Adams Street  
Suite 300  
Chicago, IL 60661  
dir: 312-463-3328  
tel: 312-345-1718  
fax: 312-345-1778



# Santander

CONSUMER



P.O. BOX 961245  
Fort Worth, TX 76181-1245

Account Number: 7761458

Primary Name:

GERMAINE GRANT

Good Through	Total Payoff	Principal	Interest	Late Fees	Misc. Fees	
Sep 08, 2011	\$8,929.19	\$5,269.16	\$1,243.93	\$149.10	\$2,267.00	
Effective Date	Amount	Principal	Interest	Late Fees	Misc. Fees	Principal Balance
Aug 08, 2011	\$1,337.00	\$0.00	\$0.00	\$0.00	\$1,337.00	\$5,269.16
Recovery fee assessment Replevin Legal Fees						
Feb 08, 2011	\$250.00	\$0.00	\$0.00	\$0.00	\$250.00	\$5,269.16
Recovery fee assessment System Generated Transaction						
Feb 08, 2011	\$325.00	\$0.00	\$0.00	\$0.00	\$325.00	\$5,269.16
Recovery fee assessment Repo Fees						
Jan 20, 2011	\$100.00	\$0.00	\$0.00	\$0.00	\$100.00	\$5,269.16
Recovery fee assessment System Generated Transaction						
Jan 12, 2011	\$6,258.76	\$5,269.16	\$840.50	\$0.00	\$149.10	\$5,269.16
Reversal of system allocated payoff Stop Payment or other return reason						
Jan 12, 2011	\$255.00	\$0.00	\$0.00	\$0.00	\$255.00	\$0.00
Reversal of recovery fees Stop Payment or other return reason						
Dec 30, 2010	\$-6,258.76	\$-5,269.16	\$-840.50	\$0.00	\$-149.10	\$0.00
System allocated payoff Lockbox Payment BTCH# 00001528 SEQ# 0043 CK# 001061						
Dec 30, 2010	\$-255.00	\$0.00	\$0.00	\$0.00	\$-255.00	\$5,269.16
Recovery fee payment Lockbox Payment						
Dec 28, 2009	\$85.00	\$0.00	\$0.00	\$0.00	\$85.00	\$0.00
Recovery fee assessment Repo Fees						
Dec 22, 2009	\$85.00	\$0.00	\$0.00	\$0.00	\$85.00	\$0.00
Recovery fee assessment Repo Fees						
Nov 04, 2009	\$13.29	\$0.00	\$0.00	\$13.29	\$0.00	\$5,269.16

Exhibit 11

Late charge assessment Late Fee						
Oct 14, 2009	\$85.00	\$0.00	\$0.00	\$0.00	\$85.00	\$5,269.16
Recovery fee assessment Repo Fees						
Oct 05, 2009	\$13.29	\$0.00	\$0.00	\$13.29	\$0.00	\$5,269.16
Late charge assessment Late Fee						
Sep 04, 2009	\$13.29	\$0.00	\$0.00	\$13.29	\$0.00	\$5,269.16
Late charge assessment Late Fee						
Aug 04, 2009	\$13.29	\$0.00	\$0.00	\$13.29	\$0.00	\$5,269.16
Late charge assessment Late Fee						
Jul 23, 2009	\$-159.49	\$-81.46	\$-78.03	\$0.00	\$0.00	\$5,269.16
System allocated payment Converted Regular Payment						
Jul 06, 2009	\$13.29	\$0.00	\$0.00	\$13.29	\$0.00	\$5,350.62
Late charge assessment Late Fee						
Jun 05, 2009	\$-9.38	\$-9.38	\$0.00	\$0.00	\$0.00	\$5,350.62
System allocated payment Converted Regular Payment						
Jun 05, 2009	\$-256.62	\$-170.91	\$-85.71	\$0.00	\$0.00	\$5,360.00
System allocated payment Converted Regular Payment						
Jun 04, 2009	\$13.29	\$0.00	\$0.00	\$13.29	\$0.00	\$5,530.91
Late charge assessment Late Fee						
May 05, 2009	\$12.83	\$0.00	\$0.00	\$12.83	\$0.00	\$5,530.91
Late charge assessment Late Fee						
Apr 15, 2009	\$-9.19	\$-9.11	\$-.08	\$0.00	\$0.00	\$5,530.91
System allocated payment Converted Regular Payment						
Apr 15, 2009	\$-90.81	\$0.00	\$-90.81	\$0.00	\$0.00	\$5,540.02
System allocated payment Converted Regular Payment						
Apr 06, 2009	\$4.54	\$0.00	\$0.00	\$4.54	\$0.00	\$5,540.02
Late charge assessment Late Fee						
Feb 20, 2009	\$-175.00	\$-149.07	\$-25.93	\$0.00	\$0.00	\$5,540.02
System allocated payment Converted Regular Payment						

Feb 05, 2009	\$-40.17	\$0.00	\$0.00	\$0.00	\$-40.17	\$5,689.09
System allocated payment Converted Regular Payment						
Feb 05, 2009	\$-265.81	\$-265.81	\$0.00	\$0.00	\$0.00	\$5,689.09
System allocated payment Converted Regular Payment						
Feb 05, 2009	\$-226.02	\$-209.16	\$-16.86	\$0.00	\$0.00	\$5,954.90
System allocated payment Converted Regular Payment						
Feb 04, 2009	\$11.30	\$0.00	\$0.00	\$11.30	\$0.00	\$6,164.06
Late charge assessment Late Fee						
Jan 27, 2009	\$-39.79	\$-39.79	\$0.00	\$0.00	\$0.00	\$6,164.06
System allocated payment Converted Regular Payment						
Jan 27, 2009	\$-226.21	\$-158.60	\$-67.61	\$0.00	\$0.00	\$6,203.85
System allocated payment Converted Regular Payment						
Jan 05, 2009	\$11.31	\$0.00	\$0.00	\$11.31	\$0.00	\$6,362.45
Late charge assessment Late Fee						
Dec 23, 2008	\$-39.60	\$-39.60	\$0.00	\$0.00	\$0.00	\$6,362.45
System allocated payment Converted Regular Payment						
Dec 23, 2008	\$-226.40	\$-168.66	\$-57.74	\$0.00	\$0.00	\$6,402.05
System allocated payment Converted Regular Payment						
Dec 05, 2008	\$11.32	\$0.00	\$0.00	\$11.32	\$0.00	\$6,570.71
Late charge assessment Late Fee						
Nov 24, 2008	\$-39.41	\$-39.41	\$0.00	\$0.00	\$0.00	\$6,570.71
System allocated payment Converted Regular Payment						
Nov 24, 2008	\$-226.59	\$-156.88	\$-69.71	\$0.00	\$0.00	\$6,610.12
System allocated payment Converted Regular Payment						
Nov 04, 2008	\$11.32	\$0.00	\$0.00	\$11.32	\$0.00	\$6,767.00
Late charge assessment Late Fee						
Oct 21, 2008	\$-39.22	\$-39.22	\$0.00	\$0.00	\$0.00	\$6,767.00
System allocated payment Converted Regular Payment						
Oct 21, 2008	\$-226.59	\$-156.96	\$-69.63	\$0.00	\$0.00	\$6,806.22
System allocated payment						



Converted Regular Payment						
Oct 06, 2008	\$11.32	\$0.00	\$0.00	\$11.32	\$0.00	\$6,963.18
Late charge assessment Late Fee						
Sep 18, 2008	\$-39.22	\$-39.22	\$0.00	\$0.00	\$0.00	\$6,963.18
System allocated payment Converted Regular Payment						
Sep 18, 2008	\$-226.59	\$-167.93	\$-58.66	\$0.00	\$0.00	\$7,002.40
System allocated payment Converted Regular Payment						
Sep 04, 2008	\$11.32	\$0.00	\$0.00	\$11.32	\$0.00	\$7,170.33
Late charge assessment Late Fee						
Aug 22, 2008	\$-39.22	\$-39.22	\$0.00	\$0.00	\$0.00	\$7,170.33
System allocated payment Converted Regular Payment						
Aug 22, 2008	\$-14.95	\$0.00	\$0.00	\$0.00	\$-14.95	\$7,383.97
Miscellaneous fee payment Converted Regular Payment						
Aug 22, 2008	\$-239.30	\$-174.42	\$-64.88	\$0.00	\$0.00	\$7,209.55
System allocated payment Converted Regular Payment						
Aug 22, 2008	\$14.95	\$0.00	\$0.00	\$0.00	\$14.95	\$7,383.97
Miscellaneous fee assessment Deficiency Payments						
Aug 04, 2008	\$12.71	\$0.00	\$0.00	\$12.71	\$0.00	\$7,383.97
Late charge assessment Late Fee						
Jul 24, 2008	\$-11.56	\$-11.56	\$0.00	\$0.00	\$0.00	\$7,383.97
System allocated payment Converted Regular Payment						
Jul 24, 2008	\$-100.81	\$-8.82	\$-91.99	\$0.00	\$0.00	\$7,395.53
System allocated payment Converted Regular Payment						
Jul 07, 2008	\$5.04	\$0.00	\$0.00	\$5.04	\$0.00	\$7,404.35
Late charge assessment Late Fee						
Jun 13, 2008	\$-165.00	\$-43.14	\$-121.86	\$0.00	\$0.00	\$7,404.35
System allocated payment Converted Regular Payment						
Apr 21, 2008	\$-6.77	\$0.00	\$0.00	\$0.00	\$-6.77	\$7,447.49
System allocated payment Converted Regular Payment						
Apr 21, 2008	\$-265.81	\$-265.81	\$0.00	\$0.00	\$0.00	\$7,447.49



P.O. BOX 961245  
Fort Worth, TX 76161-1245

Date: August 24, 2011  
To: GERMAINE GRANT  
Fax:  
From: Santander Consumer USA, Inc.

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**Comments:**

This is an attempt to collect a debt and any information obtained will be used for that purpose. This communication is from a debt collector.

**NOTICE TO CALIFORNIA RESIDENTS:** You are hereby notified that a negative credit report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligation.

**NOTICE TO MAINE RESIDENTS:** Hours of operation: 7 a.m. to 9 p.m. Central Time, Monday through Friday. Our toll free telephone number is 1.888.222.4227.

**NOTICE TO MASSACHUSETTS RESIDENTS:** Hours of operation: 7 a.m. to 9 p.m. Central Time, Monday through Friday. Our toll free telephone number is 1.888.222.4227.

**Notice of Important Rights:** You have the right to make a written or oral request that telephone calls regarding your debt not be made to you at your place of employment. Any such oral request will be valid for only ten (10) days unless you provide written confirmation of the request postmarked or delivered within seven (7) days of such request. You may terminate this request by writing to Santander Consumer USA.

**NOTICE TO BUFFALO RESIDENTS:** This collection agency is licensed by the City of Buffalo, New York License Number 556975.

**NOTICE TO NEW YORK CITY RESIDENTS:** This collection agency is licensed by the New York City Department of Consumer Affairs License Number 1343310.

**Confidentiality Notice:** The information contained in this facsimile message is legally privileged and confidential information intended only for the use of the individual(s) or entity named in this document. If the reader is not the intended recipient, he/she is hereby notified that any dissemination, distribution or copy of this facsimile is strictly prohibited.



GMAINE TNARG &lt;germainemoneybank@gmail.com&gt;

## discovery

1 message

GMAINE TNARG &lt;germainemoneybank@gmail.com&gt;

Thu, Nov 1, 2012 at 2:22 PM

To: Richard Sorman <rsorman@sormanfrankel.com>, David Frankel <dfrankel@sormanfrankel.com>, "Payne, Ronald" <rpayne@lbbbslaw.com>

discovery...just to let you know frank i have not receive your discovery by mail either you may have filed it with the clerk but i have not received it.i was suppose to have that by the 28th of last month

- Sincerely yours,

/s/ Germaine J Grant.

Private Attorney General, 18 U.S.C. 1964(a) <http://www.supremelaw.org/decs/agency/civil.rico.htm>

<http://www.supremelaw.org/decs/agency/private.attorney.general.htm>

we are not connected or affiliated with the law firm this link was given to inform you that private attorney general post do exist.

Small gifts return greater and what is replaced brings abundance. The wise live off the house of the fool. Protect what is yours and you will always find it. Be watchful of what you own lest you end up as a beggar. One who is always idle amounts to nothing but one who is diligent is honored.

All of the information sent through any and all forms of mediums of communication by the SUPERIOR CLAIMANT are private. Including but not limited to, any attachment(s), and are limited for the sole use of the intended recipient and may contain Privileged and/or Confidential Information.

Any omission does not constitute a waiver of any and/or ALL Intellectual Property Rights or Reserved Rights. ECPA 18 USCA 2510.Gramm-Leach Bliley Act,15 USC Subchapter I, Sec.6801-6809, Title 18 chpt.121 §§ 2701,2702,2709(c)(e)Title 18 chpt.§ 1505/1519/2239/chpt.109 § 2331

The U.S. Constitution vests all legislative power in the Congress of the United States. See Article I, Section 1. The Executive Branch of the federal government has no legislative power whatsoever. This means that agencies of the Executive Branch, and also the federal Courts in the Judicial Branch, are *prohibited* from making law. " pay close attention attorney I don't give a flying\_\_\_\_\_ about your case law if the congress made it law it's a law so if you have a case against me and the congress agreed on terms of the that word please don't fill my inbox on that hearsay bullshit... the word "account" according to FCRA and EFT is asset account, demand deposit, or saving account of the consumer and the consumer is individual according to FCRA..

## PRIVATE AND CONFIDENTIAL EMAIL TRANSMISSION PURPOSES ONLY

By: Germaine j b Grant: -

Expressly Reserving All Liberties & defenses. A Man and A Living Spirit. Not a person, human-being, corporation or other type of abomination! a Private Dweller!

Who is Not For Public Use! Foreign to the UNITED STATES, INC., as an Independent international location upon United States Minor, Outlying Islands and non-domestic to the District of Columbia.

Autochthonous Aborigines American

Exhibit 2



GMAINE TNARG &lt;germainemoneybank@gmail.com&gt;

## request for production of documents

8 messages

GMAINE TNARG &lt;germainemoneybank@gmail.com&gt;

Wed, Sep 26, 2012 at 5:00 PM

To: David Frankel &lt;dfrankel@sormanfrankel.com&gt;

Cc: Richard Sorman &lt;rsorman@sormanfrankel.com&gt;, P A general &lt;pagsettlequick@gmail.com&gt;

Bcc: "Payne, Ronald" &lt;rpayne@lbbsslaw.com&gt;

question 3 in request for production of document i ask for all document between the defendants that relate to this case and germaine grant hasn't received such documents.. now im asking for a meeting be held tomorrow around 11am by phone to the reason why germaine grant hasnt received such documents...germaine is asking to turn over discovery asap send all document to the po box address.. your firm has choose to place all discovery on public file this is not a requirement we do believe you doing so because your client want to use this private record information as a way not to turn over discovery information and germaine is requesting all documents in which he requested.....(All documents relating to and/or concerning any correspondence between all the defendants) santander requested that the records are private and igermaine need to make an appt... germaine dont need to make an appt to see documents that can be mailed to him..this discovery is private so send all documents to his po box 23 and germaine is still waiting see the valid chain of title assignment. <----- dont matter anyway we already discovered santnader didnt have valid assignment when they order the repossession

-- Sincerely yours,

/s/ Germaine J Grant.

Private Attorney General, 18 U.S.C. 1964(a) <http://www.supremelaw.org/decs/agency/civil.rico.htm>  
<http://www.supremelaw.org/decs/agency/private.attorney.general.htm>

we are not connected or affiliated with the law firm this link was given to inform you that private attorney general post do exist.

Small gifts return greater and what is replaced brings abundance. The wise live off the house of the fool. Protect what is yours and you will always find it. Be watchful of what you own lest you end up as a beggar. One who is always idle amounts to nothing but one who is diligent is honored.

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Any omission does not constitute a waiver of any and/or ALL Intellectual Property Rights or Reserved Rights. ECPA 18 USCA 2510.Gramm-Leach Bliley Act, 15 USC Subchapter I, Sec.6801-6809, Title 18 chpt.121 §§ 2701,2702,2709(c)(e)Title 18 chpt.§ 1505/1519/2239/chpt.109 § 2331

The U.S. Constitution vests all legislative power in the Congress of the United States. See Article I, Section 1. The Executive Branch of the federal government has no legislative power whatsoever. This means that agencies of the Executive Branch, and also the federal Courts in the Judicial Branch, are *prohibited* from making law. " pay close attention attorney I don't give flying\_\_\_\_\_ about your case law if the congress made it law it's law so if you have a case against Germaine and the congress agreed on terms of the that word please don't fill my inbox on that hearsay bullshit... the world "account" according to FCRA and EFT is asset account, demand deposit, saving account of the consumer and the consumer is individual according to FCRA.. you did edorse

back of your law license correct??

**PRIVATE AND CONFIDENTIAL EMAIL TRANSMISSION PURPOSES ONLY**

By: Germaine j b Grant: General Executor -

Expressly Reserving All Liberties & defenses. A Man and A Living Spirit. Not a person, human-being, corporation or other type of abomination! a Private Dweller!

Who is Not For Public Use! Foreign to the UNITED STATES, INC., as an

Independent international location upon United States Minor, Outlying

Islands and non-domestic to the District of Columbia.

**Autochthonous Aborigines American**

**P A general** <pagsettlequick@gmail.com>

Wed, Sep 26, 2012 at 5:06 PM

To: GMAINE TNARG <germainemoneybank@gmail.com>

Cc: Richard Sorman <rsorman@sormanfrankel.com>, David Frankel <dfrankel@sormanfrankel.com>

wow you haven't. received. that yet...you know what puzzle me germaine after seeing the discovery question and the way santander has answered them. why hasn't Reliaible counter Suit santander is puzzling???

[Quoted text hidden]

**Richard Sorman** <rsorman@sormanfrankel.com>

Thu, Sep 27, 2012 at 11:02 AM

To: GMAINE TNARG <germainemoneybank@gmail.com>

What phone number to call you?

Richard J Sorman  
Sorman & Frankel, Ltd  
180 North LaSalle Street  
Suite 2700  
Chicago, Illinois 60601  
Office 312.332.3535  
Cell 312.317.1515  
Rsorman@sormanfrankel.com

Sent from my iPhone

[Quoted text hidden]

**GMAINE TNARG** <germainemoneybank@gmail.com>

Thu, Sep 27, 2012 at 12:10 PM

To: Richard Sorman <rsorman@sormanfrankel.com>

8155823518

[Quoted text hidden]

**GMAINE TNARG** <germainemoneybank@gmail.com>

Thu, Sep 27, 2012 at 12:14 PM

To: Richard Sorman <rsorman@sormanfrankel.com>

germaine has ask that your clients turn over all documents you have either its accounting, communication between all defendants and Credit. bureaus you can send all documents to PO box 23

On Sep 27, 2012 11:02 AM, "Richard Sorman" <rsorman@sormanfrankel.com> wrote:

[Quoted text hidden]

---

**GMAINE TNARG** <germainemoneybank@gmail.com>

Thu, Sep 27, 2012 at 12:15 PM

To: Richard Sorman <rsorman@sormanfrankel.com>

I called. but they said your not in office today

On Sep 27, 2012 11:02 AM, "Richard Sorman" <rsorman@sormanfrankel.com> wrote:

[Quoted text hidden]

---

**Richard Sorman** <rsorman@sormanfrankel.com>

Thu, Sep 27, 2012 at 3:29 PM

To: GMAINE TNARG <germainemoneybank@gmail.com>

Cc: Richard Sorman <rsorman@sormanfrankel.com>

Mr. Grant:

First of all, no one in my office has any recollection of you calling me today. Furthermore, I've been in my office since 11AM.

I asked you for the number to call you and you didn't respond until 12:16pm at which time I was engaged in other matters. I just called you at the number you left, 815 582-3518.

A female answered and I asked for you. She said that I had the wrong number and that she didn't know anyone named Germaine Grant. I explained that I was returning your call and gave her my name. Then she said that you had gone out. She then stated that she is your daughter and that you'd return in about 30 minutes. I will be at my office, 312 332 3535 until 4:15 today. If we are unable to connect today I will call you again tomorrow.

I've reviewed the response to Request #3 and will review the documents that we have that are responsive and email those to you upon completion of such review. However, please return my call so that we're complete on this issue.

Richard J Sorman

*Exhibit 2*



**SORMAN & FRANKEL, LTD.**  
COUNSELORS AT LAW

**Richard J. Sorman**

**Sorman & Frankel, Ltd.**

**180 North LaSalle Street - Suite 2700**

**Chicago, Illinois 60601**

**312 332 3535**

**www.sormanfrankel.com**

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**From:** GMAINE TNARG [mailto:germainemoneybank@gmail.com]

**Sent:** Thursday, September 27, 2012 12:16 PM

**To:** Richard Sorman

**Subject:** Re: request for production of documents

[Quoted text hidden]

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**GMAINE TNARG** <germainemoneybank@gmail.com>

**To:** Richard Sorman <rsorman@sormanfrankel.com>

**Cc:** "Payne, Ronald" <rpayne@lbbslaw.com>

Mon, Oct 8, 2012 at 11:41 AM

we had a conversation about about you getting me requested documents that i ask for in my request for production in which i have not received as of yet, you told me that you will mail this information within couple days after you redacted the alleged account number as of today i have not receive any the information you stated that you was going to forward over to me by email..do you know how many more days your going to need to get me the documents i requested??? i need a for sure date

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The U.S. Constitution vests all legislative power in the Congress